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**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ALICIA HERNANDEZ, *et al.*,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

No. 3:18-cv-07354 WHA

**DEFENDANT WELLS FARGO BANK, N.A.'S  
REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

Date: April 2, 2020

Time: 8:00 a.m.

Courtroom: 12

Judge: Hon. William H. Alsup

**REQUEST FOR JUDICIAL NOTICE**

Pursuant to Rule 201 of the Federal Rules of Evidence and in connection with its concurrently filed Motion For Partial Summary Judgment, Defendant Wells Fargo Bank, N.A. (“Defendant” or “Wells Fargo”) respectfully requests that the Court take judicial notice of the following attached exhibits:

1. **Exhibit 1** is a true and correct copy of the Deed of Trust on the property located at 7103 Cloverlawn Drive, Paramount, CA 90723, executed by Alfonso and Sandra Campos on June 13, 2008, and filed with the Recorder’s Office for Los Angeles County, California.

2. **Exhibit 2** is a true and correct certified copy of the Notice of Default and Election to Sell Under Deed of Trust directed to Alfonso Campos and Sandra Campos, filed on February 11, 2011 with the Recorder’s Office for Los Angeles County, California.

3. **Exhibit 3** is a true and correct certified copy of the Notice of Trustee’s Sale directed to Alfonso Campos and Sandra Campos, filed on December 12, 2012 with the Recorder’s Office for Los Angeles County, California.

4. **Exhibit 4** is a true and correct certified copy of the Notice of Trustee’s Sale directed to Alfonso Campos and Sandra Campos, filed on November 5, 2013 with the Recorder’s Office for Los Angeles County, California.

5. **Exhibit 5** is a true and correct certified copy of the Trustee’s Deed Upon Sale for the property located at 7103 Cloverlawn Drive, Paramount, CA, filed on February 21, 2014 with the Recorder’s Office for Los Angeles County, California.

6. **Exhibit 6** is a true and correct copy of the Deed of Trust on the property located at 1124 Alder Creek Way, Brentwood, CA 94513, executed by Craig Allan Enis and Debora Marie Granja on February 9, 2006, and filed with the Contra Costa County Recorder’s Office.

7. **Exhibit 7** is a true and correct certified copy of the Notice of Default and Election to Sell Under Deed of Trust directed to Craig Allan Enis and Debora Marie Granja, filed on December 20, 2013 with the Contra Costa County Recorder’s Office.

8. **Exhibit 8** is a true and correct certified copy of the Notice of Trustee's Sale directed to Craig Allan Enis and Debora Maria Granja, filed on March 17, 2014 with the Contra Costa County Recorder's Office.

9. **Exhibit 9** is a true and correct certified copy of the Trustee's Deed Upon Sale for the property located at 1124 Alder Creek Way, Brentwood, CA 94513, filed on April 24, 2014 with the Contra Costa County Recorder's Office.

It is well-established that pursuant to Federal Rule of Evidence 201, a court may take judicial notice of matters of public record. *Lee v. City of Los Angeles*, 250 F.3d 668, 688-89 (9th Cir. 2001); *see also MGIC Indem. Corp. v. Weisman*, 803 F.2d 500, 504 (9th Cir.1986).

Here, the Court may take judicial notice of **Exhibits 1 through 9** because they are public records of county recorders' offices and therefore matters of public record. *See Dowers v. Nationstar Mortg., LLC*, 852 F.3d 964, n.1, 967 (9th Cir. 2017) (taking judicial notice of note and deed of trust as a matter of public record); *Rosal v. First Fed. Bank of California*, 671 F. Supp. 2d 1111, 1121 (N.D. Cal. 2009) (taking judicial notice of certain Official Records of Alameda County, including deeds of trust, notice of default, notice of trustee sale, and trustee's deed upon sale); *Haynish v. Bank of Am., N.A.*, 284 F. Supp. 3d 1037, 1045 (N.D. Cal. 2018) (taking judicial notice of deed of trust, notice of default, and notices of trustee's sale as a matter of public record); *W. Fed. Sav. v. Heflin*, 797 F.Supp. 790, 792 (N.D. Cal.1992) (taking judicial notice of certain public records of the Santa Clara County Recorder, including deeds of trust).

For the reasons stated above, Wells Fargo respectfully requests that this Court take judicial notice of the documents attached hereto as Exhibits 1 through 9.

Dated: February 20, 2020

Respectfully submitted,  
WINSTON & STRAWN LLP

By: /s/ Amanda L. Groves

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